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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

NOTICE OF FILING: DECLARATION OF
MARC WOLSTENHOLME REGARDING
SETTLEMENT CONFERENCE AND
RESPONSE TO DEFENDANT'S
COUNTER-OFFER- PLAINTIFF'S
REQUEST FOR HELP AND PLAINTIFF'S
RESPONSE TO DEFENDANT'S
COUNTER-OFFER ABUSE

15 Dated this: April 11, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

CONFIDENTIAL SETTLEMENT CONFERENCE REPLY – PLAINTIFF'S
RESPONSE TO DEFENDANT’S COUNTER-OFFER

Dear Judge, Mircheff and Judge Fernando Manzano Olguin

Pursuant to the Court’s Order (Dkt. 75), Plaintiff respectfully submits this reply to Defendant Riot Games, Inc.’s counteroffer, received on April 11, 2025, via email from counsel Joshua Geller. The respondent has again violated the orders and requests of the court, showing that they do not respect any of the orders issued by the court. They have never produced any of the orders to satisfaction and they continue bad faith to abuse the plaintiff and the court. Joshua Geller continues to rape this case to earn, and it is dangerous given that every single reply has been abused and not one single piece of evidence or order has been produced.

Plaintiff requests protection from these abusers and protection from all future direct connections with these harassing abusers, including all settlement discussions. It is clear that they intend to continue to abuse. The Plaintiff does not want any part of the damage Riot causes on the global scale and believes that if they are not shut down, they do present a global threat.

Defendant’s response offered no monetary or non-monetary terms beyond requesting that Plaintiff dismiss all claims with prejudice in exchange for Riot’s agreement not to pursue legal fees. This is not what the court ordered. This was presented alongside language suggesting Plaintiff’s claims are meritless and emphasizing Riot’s intention to seek costs if litigation continues.

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2 Plaintiff does not believe this constitutes a meaningful or good faith settlement
3 offer as envisioned by the Court's Order. Furthermore, the tone and content of Riot's
4 communications over the course of litigation—including their most recent reply—have been
5 aggressive, threatening, and designed to cause emotional distress and coercion rather than mutual
6 resolution.
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9 Due to the cumulative effect of these tactics, including documented intimidation
10 and harassment from affiliated parties, Plaintiff is no longer willing to participate in any further
11 direct settlement discussions without the direct oversight of the Court. Plaintiff affirms continued
12 participation in the scheduled settlement conference, but only under the protection and structure
13 of Court supervision. It is clear that no good will come of these conferences, and they expose the
14 Plaintiff to well documented Riot Games's abuses.
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18 Plaintiff remains open to meaningful resolution of this matter, provided
19 negotiations are conducted in a fair, respectful, and balanced environment and that the Plaintiff is
20 protected from Riot Abuse. The Plaintiff requests a widespread investigation into these abuses. It
21 will surface before long, and every origination will, have to explained why the allowed this
22 abuse to continue.
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Moreover, The Plaintiff will show that Riot is an abusive company which has never been safe. Additionally, the Plaintiff will state that he believes Riot has links to data espionage which need to be investigated.

1 Declaration of Authenticity:

2 I, Marc Wolstenholme, declare under penalty of perjury that the statements made
3 are true and accurate
4

5 Executed on April 11 2025, in Coventry, England.
6

7
8 Signature: *M. WOLSTENHOLME.*
9

10 Marc Wolstenholme
11

12 Plaintiff in Pro Per

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